

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

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| IN RE: | § | |
| | § | CASE NO. 16-10262 |
| | § | CASE NO. 16-10263 |
| SH 130 CONCESSION COMPANY, LLC, | § | CASE NO. 16-10264 |
| ZACHRY TOLL ROAD - 56 LP, | § | |
| CINTRA TX 56 LLC, | § | CHAPTER 11 |
| | § | |
| DEBTORS. | § | JOINTLY ADMINISTERED UNDER |
| | § | CASE NO. 16-10262-TMD |

**FERROVIAL AGROMAN US CORP., ZACHRY CONSTRUCTION CORP., AND
DR. DALLAS N. LITTLE’S MOTION FOR EXPEDITED HEARING
ON OBJECTIONS TO—AND MOTIONS TO VACATE, STRIKE, OR QUASH---
RULE 2004 LETTER REQUESTS FOR PRODUCTION OF DOCUMENTS
[Relates to Docs. 456, 458, and 461]**

TO THE HONORABLE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Ferrovail Agroman US Corp. (“FAUS”), Zachry Construction Corp. (“ZCC”), and Dr. Dallas N. Little (“Dr. Little”) (collectively, “Movants”), by and through their counsel of record, file this Motion for Expedited Hearing on Objections to—and Motions to Vacate, Strike, or Quash—Rule 2004 Letter Requests for Production of Documents [**Docs. 456, 458, 461**] and, in support of thereof, show the Court:

1. **UNDERLYING MOTIONS:** On December 6, 2016, each Movant filed a document captioned, in part, “Objections to—and Motion to Vacate, Strike, or Quash—Rule 2004 Letter Request for Production of Documents” (“Objections and Motions to Quash,” **Docs. 456, 457, 458**).

2. On December 7, 2016, ZCC filed its “First Amended Objections to—and Motion to Vacate, Strike, or Quash—Rule 2004 Letter Request for Production of Document” [**Doc. 461**].

3. **NEED FOR EXPEDITED HEARING:** Each of Movants’ filings seeks relief from a letter request for production of documents (“Letter Document Request”) sent to each Movant by Edmund

W. Robb IV, an attorney at Bracewell LLP (“Bracewell”), acting in its capacity as special counsel for Debtors SH 130 Concession Company, LLC (“SH 130”).

4. Each Letter Document Request requires the recipient to produce ten categories of documents to SH 130 “no later than 5:00 pm on December 16, 2016[,] at the offices of Bracewell LLP, 711 Louisiana Street, Suite 2300, Houston, Texas 77002.”

5. Local Bankruptcy Rule 2004(d) provides, in relevant part: “If an entity objects to [a requested Rule 2004] examination for any reason, it must file a motion to quash, and request and obtain an expedited hearing on such motion before the scheduled date and time of the examination.”

6. Thus, pursuant to Local Bankruptcy Rule 2004(d), Movants seek an expedited hearing and ruling on their respective “Objections and Motions to Quash” [**Docs. 456, 458, 461**] at the Court’s earliest convenience *but prior to* December 16, 2016.

7. Movants believe that an expedited hearing is warranted under these circumstances.

8. Pursuant to Section 105(a) of the United States Bankruptcy Code, “[t]he court may issue any order . . . that is necessary or appropriate to carry out the provision of this title.” Rule 9006 of the Federal Rules of Bankruptcy Procedure also allow the Court to shorten notice and set an expedited hearing as appropriate. Movants believe there is good and sufficient cause to grant this Motion to Expedite.

4. **TIME ESTIMATE FOR THE HEARING:** Movants believe that the hearing should take approximately 30 minutes.

5. **DEADLINE FOR WHEN HEARING IS NEEDED:** Movants request that the hearing on the aforementioned Objections and Motions to Quash be held *prior to* December 16, 2016.

FOR THESE REASONS, Movants respectfully ask the Court to grant this Motion to Expedite, enter an Order setting an expedited hearing on the Objections and Motions to Quash [**Docs. 456, 458,**

461] at the Court's earliest convenience *prior to* December 16, 2016, and grant such other and further relief as is just and proper.

DATED: December 7, 2016

Respectfully submitted,

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**ATTORNEYS FOR FERROVIAL AGROMAN US
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DR. DALLAS N. LITTLE**

CERTIFICATE OF CONFERENCE

I hereby certify that—in compliance with Local Bankruptcy Rule 4001(a), Local District Court Rule 5.1(a) and Local Bankruptcy Rule 9014(c)(1)—I contacted Debtors' special counsel Edmund W. Robb IV by email, in an attempt to confer with him about the filing of this Motion to Expedite. I have not yet heard whether Mr. Robb opposes an expedited hearing on this matter.

/s/ Sara Murray
Sara Murray

CERTIFICATE OF SERVICE

The undersigned attorney of record hereby certifies that on December 7, 2016, a true and correct copy of the foregoing Ferrovia Agroman US Corp., Zachry Construction Corp., and Dr. Dallas N. Little's Motion for Expedited Hearing on Objections to—and Motions to Vacate, Strike, or Quash—Rule 2004 Letter Requests for Production of Documents was filed with the Court and (1) served electronically upon those registered to receive electronic notice via the Court's CM/ECF system in the above-captioned case; and (2) served either electronically or by First Class Mail upon those included on the attached Sixth Amended Master Service List [**Doc. 391**].

/s/ David S. Gragg

David S. Gragg

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